

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SYMBOLOGY INNOVATIONS, LLC,

Plaintiff,

v.

**AMERICAN AUTOMOBILE
ASSOCIATION, INC.; AAA TEXAS, LLC,**

Defendants.

CASE NO. 3:23-CV-02866-K

JURY TRIAL DEMANDED

JOINT MOTION TO STAY ALL PENDING DEADLINES

Plaintiff Symbology Innovations, LLC and Defendants American Automobile Association, Inc. and AAA Texas, LLC (the “Parties”) respectfully request the Court to stay all pending motions, actions and deadlines for fourteen (14) days, up to and including June 4, 2024, to allow the Parties time to finalize the resolution of this lawsuit, including the submission of a Motion to Dismiss. The requested extension is not for delay, but only to allow for an orderly resolution of this lawsuit.

Dated: May 21, 2024

Respectfully submitted,

/s/ Alexander H. Martin

Neil J. McNabnay

Texas Bar No. 24002583

Ricardo J. Bonilla

Texas Bar No. 24082704

Rodeen Talebi

Texas Bar No. 24103958

Sarika Patel

Texas Bar No. 24073520

Alexander H. Martin

Texas Bar No. 24091828

mcnabnay@fr.com

rbonilla@fr.com

talebi@fr.com

patel@fr.com

martin@fr.com

FISH & RICHARDSON P.C.

1717 Main Street, Suite 5000

Dallas, Texas 75201

(214) 747-5070 (Telephone)

(214) 747-2091 (Facsimile)

ATTORNEYS FOR DEFENDANTS

**AMERICAN AUTOMOBILE ASSOCIATION,
INC. and AAA TEXAS, LLC**

Dated: May 21, 2024

Respectfully submitted,

/s/ Randall Garteiser by permission

Christopher A. Honea

Texas Bar No. 24059967

chonea@ghiplaw.com

M. Scott Fuller

Texas Bar No. 24036607

sfuller@ghiplaw.com

Randall Garteiser

Texas Bar No. 24038912

rgarteiser@ghiplaw.com

GARTEISER HONEA, PLLC

119 W. Ferguson Street

Tyler, Texas 75702

Telephone: (903) 705-7420

Facsimile: (888) 908-4400

**ATTORNEYS FOR PLAINTIFF
SYMBOLGY INNOVATIONS, LLC**

CERTIFICATE OF CONFERENCE

Pursuant to Northern District of Texas Local Rule 7.1, counsel has complied with the meet and confer requirement in Local Rule 7.1(a). Counsel for Defendants conferred with Counsel for Plaintiff on May 21, 2024, concerning the relief sought in this Motion. Counsel for Plaintiff is not opposed.

/s/ Alexander H. Martin

Alexander H. Martin

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy has been electronically filed using the CM/ECF filing system on May 21, 2024, which automatically sends email notifications to all counsel of record and which will permit viewing and downloading of same from the CM/ECF system.

/s/ Alexander H. Martin

Alexander H. Martin